

Individual Areas and Project Offices Responses

End-of-Year Report

**Provided in Response to Secretary Peña Memorandum
Dated August 4, 1997,
“DOE Response to the May 14, 1997 Explosion at
Hanford’s Plutonium Reclamation Facility”**

United States Government

Department of Energy

memorandum

Carlsbad Area Office
Carlsbad, New Mexico 88221

DATE: December 18, 1997

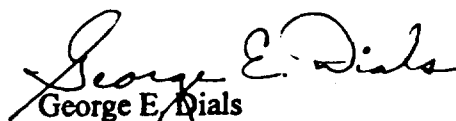
REPLY TO: CAO:AT:LBL 97-1582 (UFC 1100.00)
ATTN OF:

SUBJECT: CAO Response to AL OSHD Memorandum of September 11, 1997, Year End Report.

TO: Kim Delman, OSHD

In response to Secretary Peña's memorandum of August 4, 1997 the CAO has prepared the following documents; Attachment 1, "CAO Hazardous Material Management Process" and Attachment 2, "Technical Competencies of the Carlsbad Area Office Safety Management" for your use in preparing the AL End of Year Report. The draft copies of these reports were previously sent to you by electronic mail.

If you have any questions concerning these documents contact Bruce Lilly of my staff at (505)234-8136.


George E. Dials
Manager

Attachments

cc w/attachments:

B. Lilly, CAO

W. Walker, CAO

B. Bennington, CAO

J. Harvill, CTAC



Carlsbad Area Office

Hazardous Material Management Process Description

All hazardous materials used at the Waste Isolation Pilot Plant (WIPP) are procured through the Westinghouse Waste Isolation Division (WID) procurement process as contractually authorized by the Carlsbad Area Office (CAO). Since no significant chemical activities occur at WIPP, only small amounts of chemically hazardous materials are actually procured. During the procurement process, all procurement requests receive an internal environmental review and a review by the WID Industrial Safety group prior to the final authorization to procure the material. After the material is used, any unused portion or excess material is disposed of through the internal WID hazardous material management program. If the material can be used elsewhere, then it is dispositioned there for use. If not, the material is declared waste and disposed of in accordance with site procedures and state and federal regulations. The WID program is design to track hazardous materials from "cradle to grave." The Carlsbad Area Office Assurance Team performs oversight of the WID hazardous material management program on an annual basis to assure that site programs are being followed. In this manner, the CAO is assured that the site hazardous material management program is effective and being implemented as intended.

Technical Competencies of Carlsbad Area Office Safety Management Responses to Plutonium Reclamation Facility Explosion Concerns

In preparation for the May 1998 Declaration of Operational Readiness, the Carlsbad Area Office (CAO) has developed the Waste Isolation Pilot Plant (WIPP) Department of Energy Operational Readiness Review Plan-of-Action. Within this document, the CAO has identified those CAO personnel responsible for technical oversight of WIPP Operations. Incumbents include two Senior Technical Managers, eight members of the WIPP Site Team, and three members of the Assurance Team. They have a combined total of 210 years of relevant operational experience.

The technical competency of these individuals to perform their assigned functions is assured by the CAO Employee Qualification Program which was developed in 1995. The organization and performance of this program assure a high level of excellence in the performance of the duties of these thirteen individuals, as well as excellence by each other member of the CAO. Within this program, the roles and responsibilities (or Functional Job Description) for each CAO position were initially identified. The required areas and levels of competency (or Qualification Standard) to perform these roles and responsibilities were then compiled and developed into a position-specific Qualification Card. Each assigned individual was assessed against the necessary areas and levels in the Qualification Card, and Individual Development Plans (IDPs) were prepared. For each CAO position and assigned individual, the IDP specified both the necessary training to attain the needed area and level of competency identified in the Qualification Card and any future training necessary to maintain the identified level of competency. For each CAO position, a notebook containing the Functional Job Description, the Qualification Standard, the Qualification Card, and the IDP has been prepared. These notebooks are maintained by each responsible individual at CAO.

CAO personnel responsible for technical oversight of WIPP operations have therefore been either trained to the necessary levels of competency for a position or have had such training identified. These training requirements are based on the specific core technical areas derived from the Department-Wide General Technical Base Qualification Standard. These core areas include Nuclear and Radiological Fundamentals, Quality Assurance, Environmental Management, Industrial Safety, Conduct of Operations, Nuclear Safety, and Technical Communications. As necessary, position-specific training has been identified to supplement this core training and assure continued excellence in the performance of assigned responsibilities. Position-specific training has included hazardous material management, hazardous waste management, Resource Conservation and Recovery Act Compliance, general environmental compliance, mine safety, fire safety, and radiation protection.

United States Government

Department of Energy

memorandum

Carlsbad Area Office
Carlsbad, New Mexico 88221

DATE: DEC 01 1997

REPLY TO
ATTN OF: CAO:AT:LBL 97-1574 (UFC 1300.00)

SUBJECT: Responses to Secretarial Memos


TO: Alex Griego, AL

As you are aware, the Waste Isolation Pilot Plant is a new facility, we have never had radioactive material on site to store or create a hazard.

In response to the August 4, 1997 memo bullet #2, chemical and radiological vulnerabilities, the Waste Isolation Pilot Plant (WIPP) does not currently have any facilities that are in the standby, deactivated, shutdown mode or that would otherwise meet the criteria. The mode of operation at the WIPP is active and there has been no changes in the mode of operation over the past seven years.

In response to the October 21, 1997 memo concerning chemical and radioactive waste storage tanks, the WIPP does not have any chemical or radioactive waste storage tanks.

If you have any questions, please call me at (505) 234-8138.


George E. Dials
Manager



printed on recycled paper



Westinghouse
Electric Corporation

Government and Environmental
Services Company

DA:97:1704
UFC:1200.00
Waste Isolation Division
P.O. Box 2078
Carlsbad, New Mexico 88221

December 11, 1997

Mr. L. B. Lilly, Manager
Safety and Occupational Health
U. S. Department of Energy
Carlsbad Area Office
P. O. Box 3090
Carlsbad, NM 88221-3090

Subject: RESPONSES TO SECRETARY PEÑA'S MEMORANDUM DATED
AUGUST 4, 1997

Dear Mr. Lilly:

The subject memorandum from Secretary Peña required responses from each DOE facility. The following is the response from the DOE Contractor, Westinghouse Waste Isolation Division (WID):

- DOE site contractors must scrutinize their use or storage of any chemicals that have the potential for explosion, fire, or significant toxic release, and must promptly dispose of unneeded chemicals in accordance with safety requirements and environmental regulations. DOE field offices should develop an approval process to assure the disposal or safe and environmentally compliant storage and handling of such chemicals that are retained.

Response: The WID has a procedure and a self imposed requirement to perform quarterly inventories of all chemicals on site and prepare a report that is reviewed by the Environmental Compliance and Support (EC&S) Section as well as by the sites' certified Industrial Hygienist. The quarterly review includes evaluating the chemicals and their storage for the potential for explosion, fire, and toxic release. In addition, each year a hazard survey is performed of the site which includes a specific chemical survey to meet the requirements of DOE Order 151.1. Lastly, there was a 100% field verification review of all the chemicals on site by EC&S as an oversight inspection to ensure proper reporting by the chemical custodians in the quarterly report. After a review of these actions, it has been concluded the Waste Isolation Pilot Plant (WIPP) Site's chemical inventory is stored correctly and there are no unneeded chemicals with the potential for explosion, fire, or significant toxic release that require disposal at this time.

Mr. L. B. Lilly

If disposal is required, WIPP controlled procedures are used. The controlled procedures have a stringent approval process to ensure proper disposal of any chemical.

- DOE and contractor field organizations with operational responsibilities must assess the technical competence of their staff to recognize the full range of hazards presented by the materials in their facilities, act on results, and implement training programs where needed.

Response: The quarterly report, as mentioned above, is performed by personnel who have been designated as Hazardous Materials Area Representatives (HMAR). The HMAR are required to be trained in the use of Material Safety Data Sheets, hazardous material characteristics and identification, SARA 311-312, and inventory reporting requirements and penalties for non-compliance. A recent review of this training indicated that not all of the representatives were current in their qualifications. A finding has been issued to the Manager of Industrial Safety and Hygiene to ensure that all managers of the HMAR are informed and take action to complete the outstanding training which must be completed by December 30, 1997.

The quarterly reports are reviewed by the certified Industrial Hygienist who is qualified by his degree and his certification. A review was done on the status of his training and he has maintained his annual requirement for continued education as a hygienist and all other training is current.

The personnel in the EC&S Section that review the quarterly report are trained in accordance with DOE Order 5480.20A, Personnel Selection, Qualifications, and Training Requirements for DOE Nuclear Facilities. The WIPP has implemented a Systematic Approach to Training (SAT) which includes training requirements for the EC&S Regulatory Specialist/On-Call Personnel. Review of the quarterly chemical inventories are targeted at possible chemical substitutions to less toxic chemicals, threshold planning quantities, and chemical compatibility with other chemicals stored in the same area.

The annual hazard survey is contracted out to subcontractors with specific expertise in the area of chemical hazard surveys. A review was performed of the last survey which was conducted in September 1997, and the subcontractor was qualified and experienced in chemical hazard surveys.

- DOE field offices must assess their site Lessons Learned and Occurrence Reporting Programs to assure that: 1) outgoing information is well characterized and properly summarized, and 2) incoming information is thoroughly evaluated, properly disseminated, appropriately implemented, and tracked through formal management systems.

Response: The WIPP has reviewed their Lessons Learned and Occurrence Reporting programs to assure that: 1) outgoing information is well characterized and properly summarized, and 2) incoming information is thoroughly evaluated, properly disseminated, appropriately implemented, and tracked through formal management systems. The following information documents the results of the review.

Occurrence Reporting

DOE Order 232.1 is being implemented by WIPP Procedure WP 12-ES3918, Reporting Occurrences In Accordance with DOE Order 232.1. At the time of the review, WP 12 ES3918 was being revised to include the new requirements contained in DOE Order 232. 1A. The requirements contained in the procedure directs the Facility Manager Designee on how to properly complete an occurrence report so that outgoing information is well characterized and properly summarized. To ensure this, all occurrence reports are reviewed by WID Senior Management, (Operations Manager and Environment, Safety and Health Manager), prior to the report being uploaded into the Occurrence Reporting and Processing System (ORPS) Data base. In addition, one full time Facility Manager Designee is utilized to write and upload all occurrence reports. This ensures events are uniformly categorized and information contained in the reports is consistent.

All open ORPS related corrective actions are entered into the Systematic Tracking and Action Reporting (STAR) data base. The STAR is the site wide formal tracking system which is used to ensure ORPS related corrective actions are tracked to completion.

A report is sent to the cognizant department managers and facility manager listing the status of all non-final occurrence reports and open corrective actions. Department managers and the facility manager are also provided a report by February 15, identifying the root causes of the final occurrence reports that occurred during the previous calendar year. This report is used to identify negative trends for appropriate action.

A copy of all final occurrence reports are sent to the department managers for their review and use. A copy of all final occurrence reports is also given to the WID Lessons Learned Working Group (LLWG). The LLWG reviews the reports to determine if a one page Lessons Learned Bulletin should be developed and disseminated to the department managers for inclusion in to their Required Reading Programs.

Lessons Learned

The Lessons Learned Program is implemented by WID Charter, MC 9.20, LLWG. The charter requires the use of an integrated LLWG. The group is made up of individuals from the Engineering, Environment, Safety and Health, Human Resources, Operations, and Quality and Regulatory Assurance. Each member serves a minimum of six months on the group.

The LLWG reviews lessons learned material obtained from the Federal Government, industry, DOE List Server, and from WIPP's own operating experience, Final Occurrence Reports, internal investigative reports etc. A Lessons Learned Bulletin is developed from those lessons learned materials deemed applicable to WIPP. Lessons learned material is deemed applicable if it contains information having potential or immediate impact on plant equipment, the safety and health of plant personnel, or if it contains good work practices. A Lessons Learned Bulletin consists of a brief description of the event, cause of the event, lessons to be learned, and references.

During 1997, the LLWG has met ten times. The group reviewed approximately 3400 lessons learned materials for applicability. Twenty four Lessons Learned Bulletins were developed from that material. The Lessons Learned Bulletins were disseminated to the WIPP department managers for inclusion into their respective Required Reading Programs.

Effectiveness of the Lessons Learned Program is measured through the use of a questionnaire. The questionnaire is attached to the Lessons Learned Bulletin as it is disseminated to the department managers. The questionnaire asks if the Lessons Learned is applicable to their department. If the Lessons Learned Bulletin is applicable, what action was taken as a result of the Lessons Learned Bulletin. Once the questionnaire is completed, the department manager returns it to the LLWG through the Environment, Safety, and Health Manager.

In conclusion, the chemical assessments that have been performed on site to date and the trained personnel performing these assessments ensures that that hazards are understood and controlled appropriately. WIPP does not have a need for a corrective action plan associated with a vulnerability assessment. All of the appropriate managers have reviewed and understand the issues in the Alert Bulletin. The bulletin referred to facilities in shutdown, transition, or deactivation mode. WIPP does not fall into any one of these categories. However, actions required by the Alert Bulletin have been completed. The surveillance data that was gathered during the chemical inventories of the WIPP site ensures that we clearly understand the hazards associated with those inventories and that the site will respond appropriately.

Sincerely,

J. A. Davis, Manager
Health, Safety, and Emergency Services

lc

Mr. L. B. Lilly

December 11, 1997

DA:97:1704

bcc: WID Distribution

O. W. Eaton MS-160
S. C. Kouba MS-170